WILLIAM J. GEDDES 1 Nevada Bar No. 6984 KRISTEN R. GEDDES Nevada Bar No. 9027 THE GEDDES LAW FIRM, P.C. 1575 Delucchi Lane, Suite 206 Email: Will@TheGeddesLawFirm.com Email: Kristen@TheGeddesLawFirm.com Reno, Nevada 89502 Phone: (775) 853-9455 Fax: (775) 299-5337 Attorneys for Plaintiff Rubin McElroy 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 RUBIN McELROY, an individual, Case No. 3:21-cv-00079-MMD-CLB 10 Plaintiff, 11 STIPULATION AND ORDER TO EXTEND VS. 12 TIME TO OPPOSE DEFENDANTS RENO VALLEY JOIST, LLC; RENO ORTHOPEDIC ORTHOPEDIC CLINIC, P.C. AND 13 CLINIC, P.C.; THOMÁS CHRISTENSEN, THOMAS CHRISTENSEN, M.D.'S M.D.; DOES I-X; and DOE BUSINESS MOTION FOR PARTIAL REMAND 14 ENTITIES 1-10. (First Request) 15 Defendants. 16 17 Plaintiff RUBIN McELROY and Defendants RENO ORTHOPEDIC CLINIC, P.C. and 18 THOMAS CHRISTENSEN, M.D., by and through their respective counsel, hereby stipulate and agree that Plaintiff may have an extension of time, through and including Monday, March 22, 2021, to file 19 20 his opposition to Defendants Reno Orthopedic Clinic and Thomas Christensen, M.D.'s Motion for 21 Partial Remand [ECF 020]. Pursuant to this stipulation, the parties hereby request that the Court grant 22 this enlargement of time. This is the first request for such an extension and the parties submit that 23 24 25 26 27 28

1	the request is made in good faith and not for the purpose of delay.	
2	Dated this 17 th day of March 2021.	THE GEDDES LAW FIRM, P.C.
3		L.Car
4		9 Jayre
5		WILLIAM J. GEDDES, ESQ. Nevada Bar No. 6984 KRISTEN R. GEDDES, ESQ.
6		Nevada Bar No. 9027 1575 Delucchi Lane Suite, 206
7		Reno, Nevada 89521
8		Tel: (775) 853-9455 Will@thegeddeslawfirm.com
9		Kristen@thegeddeslawfirm.com Attorneys for Plaintiff Rubin McElroy
10	- 1.1. 4 - th 1	VENTANIA ARVINDINA RIAFINDERA
11	Dated this 17 th day of March 2021.	LEMONS, GRUNDY & EISENBERG
12		Electronic Signature Authorized
13		By: /s/ Alice Campos Mercado
14		EDWARD J. LEMONS, ESQ., Nevada Bar No. 699
15		ALICE CAMPOS MERCADO,
16		ESQ., Nevada Bar No. 4555 6005 Plumas Street, Third Floor
		Reno, Nevada 89519
17		Tel: (775) 786-6868 Fax: (775)786-9716
18		Emails: ejl@lge.net; acm@lge.net
19		Attorneys for Defendants Reno Orthopedic Clinic, P.C., and
20		Thomas Christensen, M.D
21		
22		ORDER
23		
24	Dated: March 17, 2021	IT IS SO ORDERED
25		10
26		and the second
27		UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

1 2 I hereby certify that I am an employee of the Geddes Law Firm, P.C., and that on March 17, 3 **2021**, I caused to be served a copy of the foregoing Stipulation and Order to Extend Time to Oppose 4 Defendants Reno Orthopedic Clinic and Thomas Christensen, M.D.'s Motion for Partial Remand [ECF 5 020], by filing the same with the Court's electronic filing system (PACER), addressed to the following: 6 CHRISTOPHER S. MANN (appearing pro hac vice) JACOB J. PRITT (appearing pro hac vice) JONES WALKER LLP 201 St. Charles Ave., Ste. 5100 New Orleans, LA 70170 (504) 582-8332 11 | cmann@joneswalker.com ipritt@joneswalker.com Attorneys for Defendant Valley Joist, LLC 13 SHANNON S. PIERCE, Nevada Bar No. 12471 14 FENNEMORE CRAIG, P.C. 7800 Rancharrah Parkway 15 Reno, NV 89511 Tel: (775) 788-2200 / Fax: (775) 786-1177 16 Email: spierce@fennemorelaw.com Attorneys for Defendant Valley Joist, LLC 18 EDWARD J. LEMONS, ESQ., Nevada Bar No. 699 ALICE CAMPOS MERCADO, ESQ., Nevada Bar No. 4555 19 LEMONS, GRUNDY & EISENBERG 6005 Plumas Street, Third Floor Reno, Nevada 89519 Tel: (775) 786-6868 / Fax: (775)786-9716 21 Emails: ejl@lge.net; acm@lge.net Attorneys for Defendants Reno Orthopedic Clinic, P.C., and Thomas Christensen, M.D. 23

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27 28 KRISTEN R. GEDDES

An employee of the Geddes Law Firm, P.C.